

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

United States Courts  
Southern District of Texas  
FILED

January 16, 2020

UNITED STATES OF AMERICA

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§

SEALED

David J. Bradley, Clerk of Court

v.

No. 4:19CR271

Judge Jordan

4:20-MJ-0076

MELIK B. EBRAHIM (2)

UNSEALED Upon Arrest

FIRST SUPERSEDING INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 21 U.S.C. § 846

(Conspiracy to Possess with the Intent to  
Distribute and Distribution of Cathinone  
and Cathine (KHAT))

That from sometime in or about 2015, and continuously thereafter up to and  
including the date of this First Superseding Indictment, in the Eastern District of  
Texas and elsewhere,

**Melik B. Ebrahim**

defendants, did knowingly and intentionally combine, conspire, and agree with each  
other and other persons known and unknown to the United States Grand Jury, to  
knowingly and intentionally possess with the intent to manufacture, distribute and

possess with the intent to distribute a mixture or substance containing a detectable amount of cathinone and cathine (KHAT), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 846.

**Count Two**

Violation: 21 U.S.C. § 841(a)(1)  
(Possession with the Intent to Distribute  
and Distribution of KHAT)

That from sometime in or about 2015, and continuously thereafter up to and including the date of this First Superseding Indictment, in the Eastern District of Texas and elsewhere,

[REDACTED]  
**Melik B. Ebrahim**  
[REDACTED]

defendants, did knowingly and intentionally possess with the intent to distribute a mixture or substance containing a detectable amount of cathinone and cathine (KHAT), a violation of 21 U.S.C. § 841(a)(1).

In violation of 21 U.S.C. § 841(a)(1).

**NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE**  
**Criminal Forfeiture Pursuant to 21 U.S.C. § 853**

As a result of committing the offenses charged in this First Superseding Indictment, the defendants shall forfeit to the United States, pursuant to 21 U.S.C. § 846, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived

## Substitute Assets

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with a third person;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

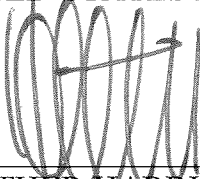
First Superseding Indictment – Page 3

A TRUE BILL

*LM*

GRAND JURY FOREPERSON

JOSEPH D. BROWN  
UNITED STATES ATTORNEY



HEATHER HARRIS RATTAN  
Assistant United States Attorney

*12/11/19*

Date

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA

v.

[REDACTED]

MELIK B. EBRAHIM (2)

[REDACTED]

§  
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§

**SEALED**

No. 4:19CR271

Judge Jordan

**NOTICE OF PENALTY**

**Count One**

Violation: 21 U.S.C. § 846

Penalty: Not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

Special Assessment: \$100.00

**Count Two**

Violation: 21 U.S.C. § 841(a)(1)

Penalty: Not less than 10 years and not more than life imprisonment, a fine not to exceed \$10 million, or both; supervised release of at least 5 years;

Special Assessment: \$100.00

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## UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

United States of America

v.

MELIK B. EBRAHIM (2)

Case No. 4:19-cr-271 (Mazzant)

**4:20-MJ-0076**

Defendant

RECEIVED  
UNITED STATES MARSHAL  
E/TX-SHERMAN  
2019 DEC 12 A 9:15

## ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Melik B. Ebrahim

who is accused of an offense or violation based on the following document filed with the court:

- ☐ Indictment    ☒ Superseding Indictment    ☐ Information    ☐ Superseding Information    ☐ Complaint  
☐ Probation Violation Petition    ☐ Supervised Release Violation Petition    ☐ Violation Notice    ☐ Order of the Court

This offense is briefly described as follows:

21 U.S.C. § 846 (Conspiracy to Possess with the Intent to Distribute and Distribution of Cathinone and Cathine (KHAT))  
 21 U.S.C. § 841(a)(1) (Possession with the Intent to Distribute and Distribution of KHAT)

Date: 12/11/2019

City and state: Sherman, Texas



David A. O'Toole

Issuing officer's signature

David A. O'Toole, Clerk Eastern District of Texas

Printed name and title

## Return

This warrant was received on (date) \_\_\_\_\_, and the person was arrested on (date) \_\_\_\_\_  
 at (city and state) \_\_\_\_\_

Date: \_\_\_\_\_

Arresting officer's signature

Printed name and title